

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v.

Civ. No. 00-105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

**PLAINTIFFS-JUDGMENT CREDITORS’ MOTION FOR A PROTECTIVE ORDER
AND AN ORDER QUASHING DEPOSITION NOTICES
OR, ALTERNATIVELY, FOR AN ORDER OF PRECLUSION**

For the reasons set forth in the attached Memorandum, the Plaintiffs-Judgment Creditors (“Ungars”) hereby respectfully move

(1) For a protective order finding that the Ungars are not obligated under Fed.R.Civ.P. 26, or otherwise, to cause the expert witnesses whose testimony the Ungars may present at the hearing on Defendants-Judgment Creditors’ (“Defendants”) motion to vacate to appear to be deposed by the Defendants;

(2) For an order quashing the notices served on the Ungars’ counsel purporting to require the Ungars to cause persons they have identified as potential expert witnesses to appear to be deposed by the Defendants;

(3) Alternatively, in the event that the Court finds that Rule 26 applies to the proceedings on Defendants’ motion to vacate, for an order pursuant to Rule 37(c)(1), precluding the Defendants from presenting any evidence or testimony at the hearing on their motion to vacate, due to their failure to provide the initial disclosures required by Rule 26(a)(1); and

(4) Granting any other relief the Court finds just, proper or necessary.

FEDERAL RULE OF CIVIL PROCEDURE 26(c)(1) CERTIFICATION

The Ungars' counsel certify that they have conferred with Defendants' counsel about the applicability of Rule 26 to these proceedings and have been unable to resolve their differences.

LOCAL RULE Cv 7(e) REQUEST FOR ORAL ARGUMENT

Pursuant to LR Cv 7(e), the Ungars respectfully request oral argument on this motion.

The Ungars estimate that oral argument on this motion will last approximately one hour.

Dated: November 17, 2010

Plaintiffs-Judgment Creditors,
by their Attorneys,

/s/ David Strachman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 17, 2010, I filed this motion via ECF which served the following counsel of record:

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